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11-CV-00222-DECL

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U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION,

Plaintiff,

v.

JOHN DOES 1-11 CONTROLLING A
COMPUTER BOTNET THEREBY
INJURING MICROSOFT AND ITS
CUSTOMERS,

Defendants.

Case No. 2:11-cv-00222

**DECLARATION OF JEFFREY L.
COX IN SUPPORT OF MICROSOFT
CORPORATION'S MOTION FOR
LEAVE TO FILE AN AMENDED
PROPOSED ORDER**

****FILED UNDER SEAL****

I, Jeffrey L. Cox, declare as follows:

1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP ("Orrick"), counsel of record for Plaintiff Microsoft Corp. ("Microsoft"). I make this declaration in support of Microsoft Corporation's Motion for Leave To File an Amended Proposed Order. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. Paragraph G(1) on page 8 of the originally filed Proposed Order stated that, "The seizure at the foregoing data centers and hosting providers shall take place within ten (10) business days after the issuance of this order" The Amended Proposed Order states that, "The seizure at the foregoing data centers and hosting providers shall take place no later than

DECLARATION OF JEFFREY COX IN SUPPORT OF
MOTION TO FILE AMENDED PROPOSED ORDER

Orrick Herrington & Sutcliffe LLP
701 5th Avenue, Suite 5600
Seattle, Washington 98104-7097
tel+1-206-839-4300

1 seven (7) days after the date of issue of this order. The seizure may continue from day to day, for
2 a period not to exceed three (3) days, until all items have been seized. The seizure shall be made
3 by the United States Marshals Service."

4 3. Attached hereto as Exhibit A is a true and correct copy of Microsoft's Amended
5 Proposed Order.
6

7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct to the best of my knowledge.
9

10 Executed this 25th day of February, 2011.
11

12 
13 Jeffrey L. Cox
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Exhibit A

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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 MICROSOFT CORPORATION,

12 Plaintiff,

13 v.

14 JOHN DOES 1-11 CONTROLLING A
15 COMPUTER BOTNET THEREBY
16 INJURING MICROSOFT AND ITS
17 CUSTOMERS,

Defendants.

Case No.

**AMENDED [PROPOSED] EX PARTE
TEMPORARY RESTRAINING
ORDER, SEIZURE ORDER AND
ORDER TO SHOW CAUSE RE
PRELIMINARY INJUNCTION**

****FILED UNDER SEAL****

18 Plaintiff Microsoft Corporation ("Microsoft") has filed a complaint for injunctive and
19 other relief pursuant to: (1) the Computer Fraud and Abuse Act (18 U.S.C. § 1030); (2) the CAN-
20 SPAM Act (15 U.S.C. § 7704); (3) the Lanham Act (15 U.S.C. §§ 1114(a)(1), 1125(a), (c)); and
21 (4) the common law of trespass, conversion and unjust enrichment. Microsoft has moved *ex parte*
22 for an emergency temporary restraining order pursuant to Rule 65(b) of the Federal Rules of Civil
23 Procedure, a seizure order pursuant to 15 U.S.C § 1116(d), and an order to show cause why a
24 preliminary injunction should not be granted.

25 **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

26 Having reviewed the papers, declarations, exhibits, and memorandum filed in support of
27 Microsoft's Application for *Ex Parte* Temporary Restraining Order, *Ex Parte* Seizure and Order
28 to Show Cause Re Preliminary Injunction ("TRO Application"), the Court hereby makes the

1 following findings of fact and conclusions of law:

2 1. This Court has jurisdiction over the subject matter of this case and there is good
3 cause to believe that it will have jurisdiction over all parties hereto; the Complaint states a claim
4 upon which relief may be granted against the Defendants under the Computer Fraud and Abuse
5 Act (18 U.S.C. § 1030); CAN-SPAM Act (15 U.S.C. § 7704); the Lanham Act (15 U.S.C. §§
6 1114, 1125); and the common law of trespass to chattels, conversion and unjust enrichment.

7 2. Microsoft owns the registered trademarks "Microsoft", "Windows", and
8 "Hotmail", used in connection with its services, software, and products.

9 3. There is good cause to believe that Defendants have engaged in and are likely to
10 engage in acts or practices that violate the Computer Fraud and Abuse Act (18 U.S.C. § 1030);
11 CAN-SPAM Act (15 U.S.C. § 7704); the Lanham Act (15 U.S.C. §§ 1114, 1125); and the
12 common law of trespass to chattels, conversion and unjust enrichment, and that Microsoft is,
13 therefore, likely to prevail on the merits of this action.

14 4. There is good cause to believe that, unless the Defendants are restrained and
15 enjoined by Order of this Court, immediate and irreparable harm will result from the Defendants'
16 ongoing violations of the Computer Fraud and Abuse Act (18 U.S.C. § 1030); CAN-SPAM Act
17 (15 U.S.C. § 7704); the Lanham Act (15 U.S.C. §§ 1114, 1125); and the common law of trespass
18 to chattels, conversion and unjust enrichment. The evidence set forth in Microsoft's Application
19 for an Emergency Temporary Restraining Order, Seizure Order and Order to Show Cause Re
20 Preliminary Injunction ("TRO Motion"), and the accompanying declarations and exhibits,
21 demonstrates that Microsoft is likely to prevail on its claim that Defendants have engaged in
22 violations of the foregoing laws by: (1) intentionally accessing and sending malicious software to
23 Microsoft's and its customers' protected computers and operating systems, without authorization,
24 in order to infect those computers and make them part of the botnet; (2) sending malicious
25 software to configure, deploy and operate a botnet; (3) sending unsolicited spam e-mail to
26 Microsoft's Hotmail accounts; and (4) sending unsolicited spam e-mails that falsely indicate that
27 they are from or approved by Microsoft and that promote counterfeit pharmaceuticals and other
28 fraudulent schemes. There is good cause to believe that if such conduct continues, irreparable

1 harm will occur to Microsoft and the public, including Microsoft's customers. There is good
2 cause to believe that the Defendants will continue to engage in such unlawful actions if not
3 immediately restrained from doing so by Order of this Court.

4 5. There is good cause to believe that immediate and irreparable damage to this
5 Court's ability to grant effective final relief will result from the sale, transfer, or other disposition
6 or concealment by Defendants of the botnet command and control software that is hosted at and
7 otherwise operates through the 96 Internet Protocol (IP) addresses and the Internet domains at
8 issue in Microsoft's TRO Application and from the destruction or concealment of other
9 discoverable evidence of Defendants' misconduct available at those locations if the Defendants
10 receive advance notice of this action. Based on the evidence cited in Microsoft's TRO
11 Application and accompanying declarations and exhibits, Microsoft is likely to be able to prove
12 that: (1) the Defendants are engaged in activities that directly violate U.S. law and harm Microsoft
13 and the public, including Microsoft's customers; (2) the Defendants have continued their unlawful
14 conduct despite the clear injury to the foregoing interests; (3) the Defendants are likely to delete or
15 relocate the botnet command and control software at issue in Microsoft's TRO Application and
16 the harmful, malicious, and trademark infringing software disseminated through these IP
17 addresses and domains and to warn their associates engaged in such activities if informed of
18 Microsoft's action. Microsoft's request for this emergency *ex parte* relief is not the result of any
19 lack of diligence on Microsoft's part, but instead is based upon the nature of Defendants' unlawful
20 conduct. Therefore, in accordance with Fed. R. Civ. P. 65(b) and 15 U.S.C. § 1116(d), good
21 cause and the interests of justice require that this Order be Granted without prior notice to the
22 Defendants, and accordingly Microsoft is relieved of the duty to provide the Defendants with prior
23 notice of Microsoft's motion.

24 6. There is good cause to believe that the Defendants have engaged in illegal activity
25 using the data centers and/or Internet hosting providers identified in Appendix A to host the
26 command and control software and the malicious botnet code and content used to maintain and
27 operate the botnet at computers, servers, electronic data storage devices or media at the IP
28 addresses identified in Appendix A.

1 7. There is good cause to believe that to immediately halt the injury caused by
2 Defendants, each of the data centers and Internet hosting providers identified in Appendix A must
3 be ordered to immediately disable the IP addresses set forth in Appendix A; to disconnect
4 Defendants' computing resources related to such IP addresses from the Internet; to cause
5 Defendants' computing resources related to such IP addresses to remain disconnected from the
6 Internet; to prevent Defendants and others from accessing computer resources related to such IP
7 addresses; and to prevent the destruction of data and evidence located on those computer
8 resources.

9 8. There is good cause to believe that to immediately halt the injury caused by
10 Defendants, and to ensure that future prosecution of this case is not rendered fruitless by attempts
11 to delete, hide, conceal, or otherwise render inaccessible the software components that distribute
12 unlicensed copies of Microsoft's registered trademarks and carry out other harmful conduct, with
13 respect to the most current, active command and control IP addresses hosted at data centers
14 operated by ECommerce, Inc.; FDCservers.net, LLC; Wholesale Internet, Inc.; Burstnet
15 Technologies, Inc. d/b/a Network Operations Center, Inc.; and Softlayer Technologies, Inc., the
16 United States Marshals Service in the judicial districts where the data centers are located should
17 be directed to seize, impound and deliver into the custody of third-party escrow service Stroz
18 Friedberg, 1925 Century Park East, Suite 1350, Los Angeles, CA 90067, all such computers,
19 servers, electronic data storage devices, software, data or media associated with the IP addresses
20 listed in Appendix A.

21 9. There is good cause to believe that the Defendants have engaged in illegal activity
22 using the Internet domains identified at Appendix B to this order to host the command and control
23 software and content used to maintain and operate the botnet. There is good cause to believe that
24 to immediately halt the injury caused by Defendants, each of the domain registries and registrars
25 set forth at Appendix B must be ordered to immediately make inaccessible, and/or remove from
26 the Internet zone file, and/or prevent registration of the domains set forth in Appendix B.

27 10. There is good cause to believe that if Defendants are provided advance notice of
28 Microsoft's TRO Application or this Order, they would move the botnet infrastructure, allowing

1 them to continue their misconduct and would destroy, move, hide, conceal, or otherwise make
2 inaccessible to the Court evidence of their misconduct, the botnet's activity, the infringing
3 materials, the instrumentalities used to make the infringing materials, and the records evidencing
4 the manufacture and distributing of the infringing materials.

5 11. There is good cause to permit notice of the instant order, notice of the Preliminary
6 Injunction hearing and service of the Complaint by formal and alternative means, given the
7 exigency of the circumstances and the need for prompt relief. The following means of service are
8 authorized by law, satisfy Due Process, satisfy Fed. R. Civ. Pro. 4(f)(3), and are reasonably
9 calculated to notify defendants of the instant order, the Preliminary Injunction hearing and of this
10 action: (1) personal delivery upon defendants who provided to the data centers and Internet
11 hosting providers contact information in the U.S.; (2) personal delivery through the Hague
12 Convention on Service Abroad or other treaties upon defendants who provided contact
13 information outside the United States; (3) transmission by e-mail, facsimile, and mail to the
14 contact information provided by defendants to the data centers, Internet hosting providers, and
15 domain registrars who host the software code associated with the IP addresses in Appendix A, or
16 through which domains in Appendix B are registered; and (4) publishing notice to the Defendants
17 on a publicly available Internet website.

18 12. There is good cause to believe that the harm to Microsoft of denying the relief
19 requested in its TRO Application outweighs any harm to any legitimate interests of Defendants
20 and that there is no undue burden to any third party.

21 **TEMPORARY RESTRAINING ORDER AND SEIZURE ORDER**

22 **IT IS THEREFORE ORDERED** as follows:

23 A. Defendants and their representatives are temporarily restrained and enjoined from
24 intentionally accessing and sending malicious software to Microsoft's and its customers' protected
25 computers and operating systems, without authorization, in order to infect those computers and
26 make them part of the botnet; sending malicious software to configure, deploy and operate a
27 botnet; sending unsolicited spam e-mail to Microsoft's Hotmail accounts; and sending unsolicited
28 spam e-mail that falsely indicate that they are from or approved by Microsoft; or undertaking any

1 similar activity that inflicts harm on Microsoft or the public, including Microsoft's customers.

2 B. Defendants and their representatives are temporarily restrained and enjoined from
3 configuring, deploying, operating or otherwise participating in or facilitating the botnet described
4 in the TRO Application, including but not limited to the command and control software hosted at
5 and operating through the IP addresses and domains set forth herein and through any other
6 component or element of the botnet in any location.

7 C. Defendants and their representatives are temporarily restrained and enjoined from
8 using the trademarks "Microsoft," "Windows," "Hotmail," trade names, trademarks or service
9 marks, Internet Domain addresses or names, or acting in any other manner which suggests in any
10 way that Defendants' products or services come from or are somehow sponsored or affiliated with
11 Microsoft, and from otherwise unfairly competing with Microsoft, misappropriating that which
12 rightfully belongs to Microsoft, or passing off their goods as Microsoft's.

13 D. Defendants and their representatives are temporarily restrained and enjoined from
14 infringing Microsoft's registered trademarks, Registration Nos. 1200236, 2165601, 2463510 and
15 others.

16 E. Defendants and their representatives are temporarily restrained and enjoined from
17 using in connection with Defendants' activities any false or deceptive designation, representation
18 or description of Defendants' or of their representatives' activities, whether by symbols, words,
19 designs or statements, which would damage or injure Microsoft or give Defendants an unfair
20 competitive advantage or result in deception of consumers.

21 F. The data centers and Internet hosting providers identified in Appendix A to this
22 order:

23 1. Shall completely refrain from providing any notice or warning to, or
24 communicating in any way with, Defendants, Defendants' representatives, or any other persons
25 associated with the IP addresses in Appendix A, including customers and resellers, and shall
26 refrain from publicizing this Order until this Order is executed in full, except as explicitly
27 provided for in this Order;

28 2. Shall immediately take all reasonable steps necessary to completely block

1 all access by Defendants, Defendants' representatives, resellers, and any other person or computer
2 to the IP addresses set forth in Appendix A, except as explicitly provided for in this Order;

3 3. Shall immediately and completely, until further order of this Court, disable
4 the IP addresses set forth in Appendix A so that they can no longer be accessed over the Internet,
5 connected to, or communicated with in any way except as explicitly provided for in this order;

6 4. Shall immediately and completely disable the computers, servers, electronic
7 data storage devices, software, data or media assigned to or otherwise associated with the IP
8 addresses set forth in Appendix A and make them inaccessible from any other computer on the
9 Internet, any internal network, or in any other manner, to Defendants, Defendants' representatives
10 and all other persons, except as otherwise ordered herein;

11 5. Shall immediately, completely, and until further order of this Court,
12 suspend all services associated with the IP addresses set forth in Appendix A;

13 6. Shall not enable, and shall take all reasonable steps to prevent, any
14 circumvention of this order by Defendants or Defendants' representatives associated with the IP
15 addresses or any other person;

16 7. Shall disable, and shall deny to Defendants and Defendants'
17 representatives, access to any and all "backup" systems, arrangements or services that might
18 otherwise be used to support the IP addresses set forth in Appendix A or that might otherwise be
19 used to circumvent this Order;

20 8. Shall log all attempts to connect to or communicate with the IP addresses
21 set forth in Appendix A;

22 9. Shall save all communications to or from Defendants or Defendants'
23 Representatives and/or related to the IP addresses set forth in Appendix A;

24 10. Shall preserve and retain all records and documents associated with
25 Defendants' or Defendants' Representatives' use of or access to the IP addresses set forth in
26 Appendix A, including billing and contact information relating to the Defendants or Defendants'
27 representatives using these servers and all logs associated with these servers;

28 11. Shall create a written inventory of all computers, servers, and electronic

1 storage devices associated with the IP addresses set forth in Appendix A; shall provide a copy of
2 such inventory to Microsoft, its attorneys and representatives, and/or the United States Marshals
3 Service; and shall secure such computers, servers, and electronic data storage devices;

4 G. Defendants' materials bearing infringing marks, the means of making the
5 counterfeit marks, and records documenting the manufacture, sale, or receipt of things involved in
6 such violation, in the possession of data centers operated by ECommerce, Inc., FDCServers.net
7 LLC, Wholesale Internet, Inc., Burstnet Technologies, Inc., and Softlayer Technologies, Inc., set
8 forth in Paragraph F of this Order, all pursuant to 15 U.S.C. §1116(d), shall be seized:

9 1. The seizure at the foregoing data centers and hosting providers shall take
10 place no later than seven (7) days after the date of issue of this order. The seizure may continue
11 from day to day, for a period not to exceed three (3) days, until all items have been seized. The
12 seizure shall be made by the United States Marshals Service. The United States Marshals Service
13 in the judicial districts where the foregoing data centers and hosting providers are located are
14 directed to coordinate with each other and with Microsoft and its attorneys in order to carry out
15 this Order such that disablement and seizure of the servers is effected simultaneously, to ensure
16 that Defendants are unable to operate the botnet during the pendency of this case. In order to
17 facilitate such coordination, the United States Marshals in the relevant jurisdictions are set forth,
18 as follows:

- 19
20 a. Northern District of Illinois
21 U.S. Marshal: Darryl K. McPherson
22 219 S. Dearborn Street, Room 2444
23 Chicago, IL 60604
24 (312) 353-5290
25
26 b. District of Colorado
27 U.S. Marshal: John Kammerzell
28 U.S. Courthouse
901 19th St., 3rd Floor
Denver, Co 80294
(303) 335-3400

c. Middle District of Pennsylvania
U.S. Marshal: Martin J. Pane (Acting)
Federal Building
Washington Avenue & Linden Street, Room 231
Scranton, PA 18501

1 (570) 346-7277

2 d. Western District of Missouri
3 U.S. Marshal: C. Mauri Sheer
4 U.S. Courthouse
5 400 E. 9th St., Room 3740
6 Kansas City, MO 64106
7 (816) 512-2000

8 e. Eastern District of Virginia
9 U.S. Marshal: John R. Hackman
10 401 Courthouse Square
11 Alexandria, VA 22314
12 (703) 837-5500

13 f. Northern District of Texas
14 U.S. Marshal: Randy Paul Ely
15 Federal Building
16 1100 Commerce Street, Room 16F47
17 Dallas, TX 75242
18 (214) 767-0836

19 g. Western District of Washington
20 U.S. Marshal: Mark L. Ericks
21 700 Stewart Street, Suite 9000
22 Seattle, WA 98101-1271
23 (206) 370-8600

24 h. Southern District of Ohio
25 U.S. Marshal: Cathy Jones
26 U.S. Courthouse
27 85 Marconi Boulevard, Room 460
28 Columbus, OH 43215
(614) 469-5540

2. Microsoft's attorneys and forensic experts shall accompany the United States Marshals and their deputies at the foregoing described seizure, to assist with identifying, inventorying, taking possession of and isolating the computer resources, command and control software and other software components that are seized.

3. Stroz Friedberg, 1925 Century Park East, Suite 1350, Los Angeles, CA 90067, tel. (310) 623-3301, will act as substitute custodian of any and all properties seized pursuant to this Order and shall hold harmless the United States Marshals Service, arising from any acts, incidents, or occurrences in connection with the seizure and possession of the defendants' property, including any third-party claims, and the United States Marshal shall be

1 discharged of his or her duties and responsibilities for safekeeping of the seized materials.

2 4. The United States Marshals accomplishing such seizure are permitted to
3 enter the premises of the data centers operated by ECommerce, Inc., FDCServers.net LLC,
4 Wholesale Internet, Inc., Burstnet Technologies, Inc., and Softlayer Technologies, Inc., in order to
5 serve copies of this Order, carry out the terms of this Order and to verify that the data centers and
6 Internet hosting providers, the Defendants and Defendants' representatives comply with this
7 Order. The United States Marshals shall employ whatever reasonable force that is necessary to
8 carry out the terms of this Order and to inspect the contents of any computers, servers, electronic
9 data storage devices, media, room, closets, cabinets, vehicles, containers or desks or documents
10 and to dismantle any equipment utilized to carry out the activities prohibited by this Order.

11 H. The data centers operated by ECommerce, Inc., FDCServers.net LLC, Wholesale
12 Internet, Inc., Burstnet Technologies, Inc., and Softlayer Technologies, Inc.:

13 1. *Shall immediately provide Microsoft, its attorneys and representatives,*
14 *and/or the United States Marshals Service sufficient and reasonable access to its offices, facilities,*
15 *computer networks, computers and services, so that Microsoft, its attorneys and representatives*
16 *and/or the United States Marshals Service may directly supervise and confirm the implementation*
17 *of this Order.*

18 2. *Shall immediately isolate and turn over to the United States Marshals*
19 *Service all such computers, servers, electronic data storage devices or media associated with IP*
20 *addresses at the foregoing hosting companies, or a live image of all data and information on said*
21 *computers, servers, electronic data storage devices or media, as reasonably determined by*
22 *Microsoft's attorneys, forensic experts and/or the U.S. Marshals Service.*

23 I. The data centers and hosting providers identified in Appendix A to this Order:

24 1. *Shall immediately identify and create a written list of domains, if any,*
25 *hosted at the IP addresses set forth in Appendix A; shall transfer any content and software*
26 *associated with such domains to IP addresses not listed in Appendix A; and shall notify the*
27 *domain owners of the new IP addresses, and direct the domain owners to contact Microsoft's*

28 Counsel, Gabriel M. Ramsey, Orrick Herrington & Sutcliffe, 1000 Marsh Road, Menlo Park, CA
AMENDED [PROPOSED] EX PARTE TEMPORARY
RESTRAINING ORDER, SEIZURE ORDER AND ORDER
TO SHOW CAUSE RE PRELIMINARY INJUNCTION

1 90425-1015, (Tel: 650-614-7400), to facilitate any follow-on action.

2 2. Shall produce to Microsoft documents and information sufficient to identify
3 and contact Defendants and Defendants' representatives operating or controlling the IP addresses
4 set forth in Appendix A, including any and all individual or entity names, mailing addresses, e-
5 mail addresses, facsimile numbers and telephone numbers or similar contact information,
6 including but not limited to such contact information reflected in billing, usage and contact
7 records.

8 J. The domain registries and registrars identified in Appendix B to this Order:

9 1. With respect to domains in Appendix B that are currently registered shall
10 (1) immediately take all steps necessary to lock at the registry level the domains at issue in the
11 TRO Motion and to remove all such domains from the zone file and to ensure that changes to the
12 domain names cannot be made by Defendants absent a court order, (2) immediately take all steps
13 required to propagate the foregoing domain registry changes to domain name registrars; (3) hold
14 the domains in escrow; and (4) take all steps necessary to ensure that the evidence of Defendants'
15 misconduct available through the domains be preserved.

16 2. With respect to domains in Appendix B that are currently unregistered,
17 shall immediately take all necessary steps to block the registration of such domains by any third
18 party and shall take all necessary steps to cause the transfer of such domains to the domain
19 registrar account specified by Microsoft and shall take all necessary steps to cause such domains
20 to be placed within the control of Microsoft.

21 K. Anyone interfering with the execution of this Order is subject to arrest by federal or
22 state law enforcement officials.

23 L. Immediately, without prior notification of any kind (directly or indirectly) to
24 Defendants, Defendants' representatives, or any of the data centers or Internet hosting providers
25 identified in Appendix A and pending resolution of the merits of this case, upstream connectivity
26 providers to the data centers and Internet hosting providers identified in Appendix A shall
27 completely disable and shall make inaccessible connectivity to the IP addresses set forth herein.

28 **IT IS FURTHER ORDERED** that copies of this Order, notice of the Preliminary

1 Injunction hearing and service of the Complaint may be served by any means authorized by law,
2 including (1) by personal delivery upon defendants who provided contact information in the U.S.;
3 (2) personal delivery through the Hague Convention on Service Abroad upon defendants who
4 provided contact information outside the U.S.; (3) by transmission by e-mail, facsimile and mail
5 to the contact information provided by defendants to the data centers, Internet hosting providers
6 and domain registrars who hosted the software code associated with the IP addresses set forth at
7 Appendix A or through which domains in Appendix B are registered; and (4) by publishing notice
8 to Defendants on a publicly available Internet website.

9 **IT IS FURTHER ORDERED**, pursuant to Federal Rule of Civil Procedure 65(b) and 15
10 U.S.C. §1116(d)(10) that the Defendants shall appear before this Court within 28 days from the
11 date of this order, to show cause, if there is any, why this Court should not enter a Preliminary
12 Injunction, pending final ruling on the Complaint against the Defendants, enjoining them from the
13 conduct temporarily restrained by the preceding provisions of this Order.

14 **IT IS FURTHER ORDERED** that Microsoft shall post bond in the amount of \$173,000
15 as cash to be paid into the Court registry.

16 **IT IS FURTHER ORDERED** that the Defendants shall file with the Court and serve on
17 Microsoft's counsel any answering affidavits, pleadings, motions, expert reports or declarations
18 and/or legal memoranda no later than four (4) days prior to the hearing on Microsoft's request for
19 a preliminary injunction. Microsoft may file responsive or supplemental pleadings, materials,
20 affidavits, or memoranda with the Court and serve the same on counsel for the Defendants no later
21 than one (1) day prior to the preliminary injunction hearing in this matter. Provided that service
22 shall be performed by personal or overnight delivery, facsimile or electronic mail, and documents
23 shall be delivered so that they shall be received by the other parties no later than 4:00 p.m. (Pacific
24 Standard Time) on the appropriate dates listed in this paragraph.

25 **IT IS SO ORDERED**

26
27 Entered this ____ day of February, 2011.

United States District Judge

Appendix A

IP Addresses Of Command And Control Servers	Location Of The Data Centers/Hosting Companies Where Defendants Have Placed The Command And Control Servers
204.45.118.202 204.45.118.250 204.45.119.2 204.45.119.10 204.45.119.18 204.45.119.26 204.45.119.34 204.45.119.42 204.45.119.50 204.45.119.74 204.45.119.82 204.45.119.90 204.45.121.18 204.45.121.34 204.45.121.42 204.45.121.50 204.45.121.58 204.45.121.130	FDCservers.net, LLC 141 W. Jackson Blvd., Suite 1135 Chicago, IL 60604 And/or 1500 Champa St. Denver, CO 80202 And/or 15204 Kishwaukee Valley Rd. Woodstock, IL 60098
69.197.144.138 69.197.158.250 69.197.161.34 173.208.143.194 173.208.154.90 204.12.192.250 204.12.217.42 204.12.217.250 204.12.237.202 204.12.243.34 204.12.243.42 204.12.243.58 204.12.248.66 208.110.82.186 204.12.217.218 69.197.158.242 173.208.131.178 173.208.141.154 173.208.143.90 173.208.163.242 173.208.163.178 204.12.217.218 204.12.217.98 173.208.128.50 173.208.143.114	Wholesale Internet Datacenter LLC Wholesale Internet, Inc. 324 E. 11th St. Suite 1000 Kansas City, MO 64106 And/or 1102 Grand Blvd, Suite 905 Kansas City, MO 64106

204.12.220.122 208.110.71.58	
64.120.144.69 64.120.149.117 64.120.153.117 64.191.38.165 64.191.53.37 64.191.59.245 66.96.224.213 66.197.161.181 66.197.251.69 96.9.180.21 96.9.182.101 96.9.182.197 96.9.183.149 66.96.214.53 173.212.243.114 64.191.18.149 173.212.214.194 173.212.241.42 173.212.241.50	BurstNET Technologies, Inc. d/b/a Network Operations Center, Inc. 420-422 Prescott Ave Scranton, PA 18510
96.0.203.82 96.0.203.90 96.0.203.98 96.0.203.106 96.0.203.114 96.0.203.122 173.83.26.26 173.83.26.34 96.9.169.53	Ecommerce, Inc. 1774 Dividend Dr Columbus, OH 43228
74.86.210.134 208.43.17.44 208.43.18.12 208.43.40.148 208.101.27.108 208.101.27.72 74.86.210.133 173.192.135.98 173.192.135.99 208.43.157.96 173.192.135.102 67.228.206.92 174.36.237.84 208.43.102.220	Softlayer Technologies c/o Infomart Data Center Facility 1950 North Stemmons Freeway Dallas, TX 75207-3118 and 4030 Lafayette Center Dr. Chantilly, VA 20151 and

	c/o Sabey carrier hotel 3355 S. 120th Place Tukwila, WA 98168
98.126.42.26	VPLS Inc. d/b/a Krypt Technologies 1400 South Grand Ave Santa Ana, CA 92705 And/or One Wilshire 624 South Grand Ave Los Angeles, CA 90017 And/or 600 West 7th Street, Suite 530 Los Angeles, CA 90017 And/or 800 South Hope Los Angeles, CA 90017
66.79.162.86 66.79.163.102 66.79.162.138	DCS Pacific Star, LLC 5050 El Camino Real, Suite 238 and/or 268 Los Altos, CA 94022
69.50.197.191	Atjeu Publishing LLC / Atjeu Hosting LLC 1515 West Deer Valley Road Bldg C-103 Phoenix, AZ 85027
98.141.220.194 98.141.220.226 76.161.33.58	Reliable Hosting Services, LLP 11513-19 Sunset Hills Road Reston, VA 20190
96.31.81.44	Noc4Hosts Inc. 4465 W. Gandy Blvd Suite 812 Tampa FL 33611

Appendix B

Domains and Registries

- **Registries:**

Verisign Naming Services
21345 Ridgetop Circle
4th Floor
Dulles, VA 20166

Afilias USA, Inc.
Building 3, Suite 105
300 Welsh Road
Horsham, PA 19044

- **Domains:**

gbsup.com
djl004daiwyed62wd.me
osg00aqlnpspyo.info
pan00c4sshlwgi.info
ovn00elprb15b6bodr.name
db600rgsajryc.com
pre015koynvhkqja1.name
pf703fiuipluaao.com
rj7069ht31wdyxettj.info
cme070vafafcsr.info
ipj07fyuft62nxdh.name
fqw07sow85ofbe0.com
aws07tb6sl38vv.me
bap07yd2syjafp.name
ldv07yiqrpisju.com
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